

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

<b>Valerie A. Bennish</b>	:	<b>Chapter 13 Bankruptcy No. <u>19-16405 ELF</u></b>
---------------------------	---	--

## **NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

Valerie A. Bennish has filed this Motion to Modify Plan after Confirmation, with the Court.

**Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have any attorney, you may wish to consult an attorney.)

1. If you do not want this court to grant the relief sought in the motion, then on or before **August 25, 2020** you or your attorney must do all of the following:

(a) File an answer explaining your position at:  
United States Bankruptcy Court  
Robert N.C. Nix Building  
900 Market Street, Suite 400  
Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) Mail a copy to the Movant's attorney:  
Michael Schwartz, Esquire  
707 Lakeside Office Park  
Southampton, PA 18966  
215-396-7900

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable ERIC L. FRANK, United States Bankruptcy Judge, in Courtroom 1 at the United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Philadelphia, PA 19107-4299 on **September 1, 2020 at 1:00 p.m.**, or as soon thereafter as counsel can be heard, to consider the motion.

4. If a copy of the motion is not enclosed, a copy of the motion will be

provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2000 to find out whether the hearing has been cancelled because no one filed an answer.

/s/ Michael Schwartz  
**MICHAEL SCHWARTZ, ESQUIRE**  
Attorney for Movant

July 31, 2020